

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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*In Re: Methyl Tertiary Butyl Ether (“MTBE”)  
Products Liability Litigation*

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**Master File No. 1:00 – 1898  
MDL 1358 (VSB)**

**This Document Relates to:**

*New Jersey Department of Environmental Protection, et al. v.  
Atlantic Richfield Co., et al., No. 1:08-CV-00312-VSB*

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**STIPULATION AND [PROPOSED] ORDER**

On or about September 28, 2018, the Court granted Plaintiffs’ Unopposed Motion for Leave to File a Fifth Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, newly-added Defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil (collectively the “newly-added Lukoil Defendants”), and existing Defendants Lukoil Americas Corporation and Getty Petroleum Marketing Inc., that the newly-added Lukoil Defendants, Lukoil Americas Corporation and Getty Petroleum Marking Inc. shall have until November 30, 2018 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: October 8, 2018

AGREED TO BY:

AKIN GUMP STRAUSS HAUER & FELD LLP

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/s/  
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*Counsel for Lukoil Americas Corporation & Getty Petroleum Marketing Inc.*

SO ORDERED,

Dated: \_\_\_\_\_, 2018

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HON. VERNON S. BRODERICK